

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY (CAMDEN)

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**RAS Citron, LLC**

Authorized Agent for Secured Creditor  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
Facsimile: 973-404-8886

Harold N. Kaplan

In Re:

**Jill J Barbera**  
*aka Jill Barber*  
*aka Jill J. Sherako*  
*aka Jill Jessica Sherako*  
*aka Jill Sherako,*  
**Debtor.**

Case No.: 19-15210-ABA

Chapter: 7

Hearing Date: May 28, 2019

Judge: Andrew B. Altenburg Jr.

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

HEARING DATE AND TIME:  
May 28, 2019 at 10:00am

**ORAL ARGUMENT IS REQUESTED IN THE EVENT  
OPPOSITION IS TIMELY FILED**

TO:

<b><i>Debtor(s)-</i></b>	<b><i>Debtor's Attorney-</i></b>	<b><i>Trustee-</i></b>	<b><i>U.S. Trustee-</i></b>
Jill J Barbera <i>aka Jill Barber</i> <i>aka Jill J. Sherako</i> <i>aka Jill Jessica Sherako</i> <i>aka Jill Sherako</i> 3704 Elberta Ln Marlton, NJ 08053-1349	Mark S Cherry Law Office of Mark S Cherry 385 Kings Highway North Cherry Hill, NJ 08034	Joseph Marchand 117-119 West Broad St. PO Box 298 Bridgeton, NJ 08302	US Dept of Justice One Newark Center Ste 2100 Newark, NJ 07102

PLEASE TAKE NOTICE that on May 28, 2019, at 10:00a.m., or as soon thereafter as counsel may be heard, RAS Citron, LLC, attorneys for Nationstar Mortgage LLC d/b/a Mr. Cooper, the within creditor ("Creditor"), shall move before the Honorable Judge Andrew B. Altenburg Jr., United States Bankruptcy Judge, at Mitchell H. Cohen U.S. Courthouse 400 Cooper Street, 4th Floor Camden, N.J. 08101 Courtroom 4B, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, U.S. Post Office and Courthouse 401 Market Street Camden, NJ 08101**, and simultaneously served on Secured Creditor's counsel, **RAS Citron, LLC, 130 Clinton Road, Lobby B, Suite 202 Fairfield, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED:5/1/2019

**RAS Citron, LLC**  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
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By: /s/ Harold N. Kaplan  
Harold N. Kaplan, Esquire  
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